

SCHROTH & SCHROTH  
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Attorney for Material Witnesses, Alicia Rivas-Ramirez and Jose Santos Andrade-Alarcon.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

(Hon. Peter C. Lewis)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARCOS RODRIGUEZ-PERALES,

Defendant.

) Criminal Case No.:  
) Magistrate Case No.: 07MJ8938

) **MOTION FOR MATERIAL WITNESS  
) VIDEOTAPED DEPOSITION**

) Date: January 2, 2007  
) Time: 1:30 pm  
) Judge: Hon. Peter C. Lewis

**TO UNITED STATES ATTORNEY CAROL C. LAM, ASSISTANT UNITED  
STATES ATTORNEY JOHN F. WIES; TO ATTORNEY FOR DEFENDANT, MARCOS  
RODRIGUEZ-PERALES, LUPE C. RODRIGUEZ JR.;**

NOTICE IS HEREBY GIVEN that on January 2, 2007, 1:30 pm, or as soon thereafter as  
the matter may be heard, in the courtroom of Honorable Peter C. Lewis, located at 2003 W.  
Adams Ave, Ste 220, El Centro, California 92243, Alicia Rivas-Ramirez and Jose Santos  
Andrade-Alarcon, by and through their attorney of record, Robert E. Schroth, Jr., will move the  
court for an order authorizing the videotaped depositions of all three material witnesses.

1 The motion will be made on the ground that there is good cause for the order requested  
2 in that the material witnesses know of no sureties in this country who will bond them out of  
3 U.S. Marshall's custody, where they are being held at the ICJ detention facility located in \*El  
4 Centro, California during the pendency of this matter. Neither the interests of justice nor the  
5 convenience of the parties and witnesses will be served by requiring the material witnesses to  
6 remain in the ICJ until the matter is concluded.  
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8  
9 DATED: December 17, 2007

**SCHROTH & SCHROTH**

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11 By: s/ Robert E. Schroth, Jr.  
12 ROBERT E. SCHROTH, JR,  
13 Attorney for Material Witnesses  
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